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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ALICE SINANYAN, an individual; JAMES
KOURY, an individual and trustee of the
Koury Family Trust; and SEHAK TUNA, an
individual, on behalf of themselves and others
similarly situated,

Plaintiffs,

vs.

LUXURY SUITES INTERNATIONAL, LLC,
a Nevada limited liability company; RE/MAX
PROPERTIES, LLC, a Nevada limited
liability company; JETLIVING HOTELS,
LLC, a Nevada limited liability company; JAB
AFFILIATES, LLC, a Nevada limited liability
company; and DOES 1 through 100, inclusive,

Defendants.

Case No. 2:15-CV-00225-GMN-VCF

**STIPULATION AND [PROPOSED]
ORDER TO STAY CASE DEADLINES AS
TO PLAINTIFFS AND DEFENDANT
LUXURY SUITES INTERNATIONAL,
LLC ONLY**

PLEASE TAKE NOTICE, that it is hereby stipulated and requested between Plaintiffs and Defendant Luxury Suites International, LLC (“LSI”), a Nevada limited liability company, by and through counsel of record, that the Court order a stay of all proceedings in this action and all currently-pending deadlines relating to Plaintiffs and Defendant Luxury Suites International, LLC (“LSI” and collectively with Plaintiffs, the “Parties”).

The Parties have diligently pursued discovery in this matter and have several expert and lay witness depositions scheduled in the next two weeks prior to the discovery cutoff date. The Parties also have upcoming briefing due relating to LSI’s Motion for Partial Summary Judgment (ECF No. 99). Counsel for the Parties have discussed the benefits of engaging in a second session of mediation with Judge Philip Pro (Ret.) before significant additional resources and time are expended on discovery and motion practice. As a result, the Parties have agreed to suspend litigation efforts and direct their energies and resources instead to mediate in good faith in an effort to reach a settlement of the remaining claims in this action.

The Parties are considering and expect to confirm a mediation date with Judge Pro in late August. The Parties request the Court to order an immediate stay of all deadlines relating to the Parties. Any deadlines or pending motions relating to other defendants in this matter shall not be affected by this stipulation. Should efforts to mediate fail, the Parties will notify the Court no later than one week after the mediation and request a reasonable reset of the various deadlines.

DATED this 15th day of July, 2016.

**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP**

By: */s/ Justin Jones*

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Las Vegas, Nevada 89120

Attorneys for Plaintiffs Alice Sinanyan
and James Koury

1 DATED this 15th day of July, 2016.

2 **WILSON, ELSER, MOSKOWITZ,**
3 **EDELMAN & DICKER LLP**

4 By: /s/ J. Scott Burris

J. SCOTT BURRIS, ESQ.

5 Nevada Bar No. 10529

6 300 South 4th Street, 11th Floor

7 Las Vegas, NV 89101

8 Attorneys for Defendant Luxury Suites
9 International, LLC

10 **ORDER**

11 **IT IS HEREBY ORDERED** that all pending deadlines relating to Plaintiffs and
12 Defendant Luxury Suites International, LLC ("LSI") are stayed pending mediation.

13 **IT IS FURTHER ORDERED** that Plaintiffs and LSI shall file a joint status report
14 informing the Court of the status of mediation every 60 days, beginning on September 19, 2016.

15 **IT IS FURTHER ORDERED** that LSI's Motion for Partial Summary Judgment (ECF
16 No. 99) is **DENIED** without prejudice.

17 
18 _____
19 HONORABLE UNITED STATES JUDGE

20 DATED this 20 day of July, 2016.

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of July, 2016, a true and correct copy of
**STIPULATION AND [PROPOSED] ORDER TO STAY CASE DEADLINES AS TO
PLAINTIFFS AND DEFENDANT LUXURY SUITES INTERNATIONAL, LLC ONLY**
was served via the United States District Court CM/ECF system on all Parties or persons
requiring notice.

By: /s/ Dannielle Fresquez
Dannielle Fresquez, an Employee of
WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN, LLP